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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PATRICIA ARELLANO, an individual, on
behalf of herself and those similarly situated;

Plaintiff,

vs.

CLARK COUNTY COLLECTION SERVICE,
LLC, a Nevada limited liability company; and
BORG LAW GROUP, LLC, a Nevada limited
liability company,

Defendants.

Case No. : 2:15-cv-01424-JAD-NJK

**STIPULATION TO EXTEND DEADLINE
TO MOVE FOR ATTORNEY'S FEES
AND SUBMIT BILL OF COSTS**

(First Request)

STIPULATION

Plaintiff Patricia Arellano and Defendants Clark County Collection Service, LLC and
Borg Law Group, LLC ("Defendants") hereby stipulate and agree as follows:

1. On August 28, 2018, this Court granted summary judgment in the above-entitled
action and entered judgment thereon in favor of Defendants (ECF Nos. 44 and 45).

2. Pursuant to LR II 54-1(a) and LR II 54-14(a), motions for attorney's fees and bills
of costs must be filed no later than September 11, 2018.

3. The deadline for Plaintiff to file and serve a motion in accordance with Fed. R.
Civ. P. 59 and/or 60 is September 25, 2018.

4. Plaintiff has indicated that she may move for relief in accordance with Fed. R.
Civ. P. 59 and/or 60.

5. Accordingly, the parties stipulate and agree that the deadline for Defendants to

1 file a motion for attorney's fees and/or seek costs shall be continued to October 2, 2018, which is
2 one week after Plaintiff's deadline to seek relief in accordance with Fed. R. Civ. P. 59 and/or 60.
3 In the event that Plaintiff files a Rule 59 or 60 motion, the deadline for CCCS to file a motion for
4 attorney's fees and/or seek costs shall be further continued to fourteen (14) calendar days after
5 adjudication of any Rule 59 or 60 motion filed by Plaintiff.

6 6. This Stipulation is submitted to avoid duplication of efforts and is not made for
7 purpose of delay.

8 DATED this 11th day of September 2018.

DATED this 11th day of September 2018.

9
10 /s/ Keren E. Gesund
11 Keren E. Gesund, Esq.
12 GESUND & PAILET, LLC
13 5550 Painted Mirage Road
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Las Vegas, Nevada 89117


14 *Attorneys for Plaintiff*

/s/ Patrick J. Reilly
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Attorneys for Defendants

15 **ORDER**

16 IT IS SO ORDERED:

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19 UNITED STATES DISTRICT JUDGE
Dated: September 25, 2018.